



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

June 28, 2024

Via ECF

Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Knight First Amendment Institute at Columbia Univ. v. U.S. Dep't of State et al.*,  
22 Civ. 3003 (DEH)

Dear Judge Ho:

This Office represents defendants the U.S. Department of State (“State”), the U.S. Department of Homeland Security (“DHS”), and the Office of the Director of National Intelligence (“ODNI”; collectively with State and DHS, “Defendants” or the “Agencies”) in the above-referenced case brought by plaintiff Knight First Amendment Institute at Columbia University (“Plaintiff”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

I write respectfully on behalf of both parties to provide a status update pursuant to the Court’s order dated May 30, 2024, Dkt. No. 47.

As noted in the parties’ last joint status request, Dkt. No. 46, Plaintiff has requested additional information from the Agencies concerning certain of Defendants’ withholdings from the records produced in response to Plaintiff’s FOIA request. The Agencies need additional time to continue reviewing and respond to Plaintiff’s requests for information.

Accordingly, the parties respectfully propose to provide another status update within 30 days, by July 29, 2024.<sup>1</sup> This will provide an opportunity for the Agencies to gather additional information and for the parties to confer regarding outstanding issues concerning the productions to date. If there are disputes remaining following the parties’ discussions, the parties plan to confer regarding a proposed briefing schedule to resolve those issues.

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<sup>1</sup> July 28, 2024, falls on a Sunday. As a result, under Fed. R. Civ. P. 6(a)(1), the deadline is extended until Monday, July 29, 2024.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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United States Attorney for the  
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cc: Counsel of record (via ECF)